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FILED
JEANNE A. NAUGHTON, CLERK

OCT 16 2023

U.S. BANKRUPTCY COURT
TRENTON, NJ
BY DEPUTY

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

In re: BLOCKFI, INC., Et al.) Case No. 22-19361 Chapter 11
)
) MOTION OF SECURED
) CREDITOR GEORGE WYNNS
) FOR RETURN OF HIS 4.22
) BITCOIN IN EXCHANGE FOR
Debtors.) OWED UPON LOAN.
)
)
)
) Motion Hearing: November 6,
) 2023, 11:00 a.m.
)
) Honorable Michael B. Kaplan,

Judge

Secured Creditor George S. Wynns respectfully requests that the present

1 Motion shall be heard at the same time as his Objection and Response to the
2 Debtor's Tenth Omnibus Objection to Certain Claims, and said Debtor's
3 Objection are heard, on November 6, 2023, by this Honorable Court.
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5 The present Motion reiterates the secured creditor's ("Wynns's") request
6 made in his Objection and Response timely filed with the Court October 2,
7 2023 and served via email and U.S. Mail (Docket No. 1633).
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9 Wynns's supporting Affidavit was timely filed with the Court on October 3,
10 2023, (Docket No. 1652), and his accompanying Affidavit of Service was
11 received on the same date and should have been filed by the Court under the same
12 docket number. However, it appears that the Court Clerk apparently filed the
13 supporting Affidavit twice and did not file the accompanying Affidavit of Service.
14 Accordingly, that affidavit of service is Appended hereto as Exhibit A.
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18 Wynns respectfully relies upon the arguments and authorities cited in his
19 Objection and Response (Docket No. 1633) and supporting Affidavit (Docket
20 1652) for the present motion.
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22 Wynns argues that he is entitled to the return of his 4.22 Bitcoin, which he
23 still owns and placed with the Debtor solely the purpose of securing his loans
24 from the Debtor, as detailed in his Objection and Response and Affidavit
25 Supporting on file with the Court. Wynns was current on payments required for
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1 the loans at the time the present bankruptcy proceeding was filed and had never
2 been in default on the loans. The Debtor had promised to return Wynns's Bitcoin
3 upon payment of the amount owing on the loans.
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5 Wynns respectfully requests that the Court Order that counsel for the
6 Debtor will make arrangements with Wynns for the return of his Bitcoin in
7 exchange for Wynns's payment of the amount owed on the loans, which Wynns is
8 presently ready, willing and able to pay.
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11 Wynns intends to appear at the November 6th hearing via Zoom. However,
12 if for any reason Wynns is unable to appear, he respectfully requests that the order
13 requested shall be granted based upon Wynns's proof of claim submitted in
14 January 2023 (which is appended as an Exhibit to his Objection and Response),
15 and based upon the papers submitted.
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18 Dated: October 14, 2023

19 Respectfully submitted.

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22 George S. Wynns
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